Municipal Regional Permit C.6: FY 2016/2017 Implementation

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Construction Inspection Workshop

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San Mateo Countywide Water Pollution Prevention Program

Outline of Presentation

- **Regulatory Background**
- **Municipal Regional Permit C.6 Implementation**
- **Municipal Regional Permit C.6 Reporting**
- **Resources**

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Stormwater Regulations

U.S. EPA → Clean Water Act establishes NPDES permit program

State Water Resource Control Board → NPDES Permitting authority in CA
Issues State Construction Stormwater General Permit

Regional Water Quality Control Board
9 regions → Issues MRP to Phase I MS4s
Inspects/Enforces State Construction General Permit

Municipal Separate Storm Sewer System (MS4) → Implement Local Stormwater Program

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Municipal Regional Permit (MRP)

- **Regional permit regulating municipal stormwater systems**
- **Applies to 76 cities, counties, and districts in:**
  - Santa Clara, Alameda, Contra Costa, and San Mateo Counties
  - Fairfield and Suisun City (Solano County)
  - Vallejo (Solano County)

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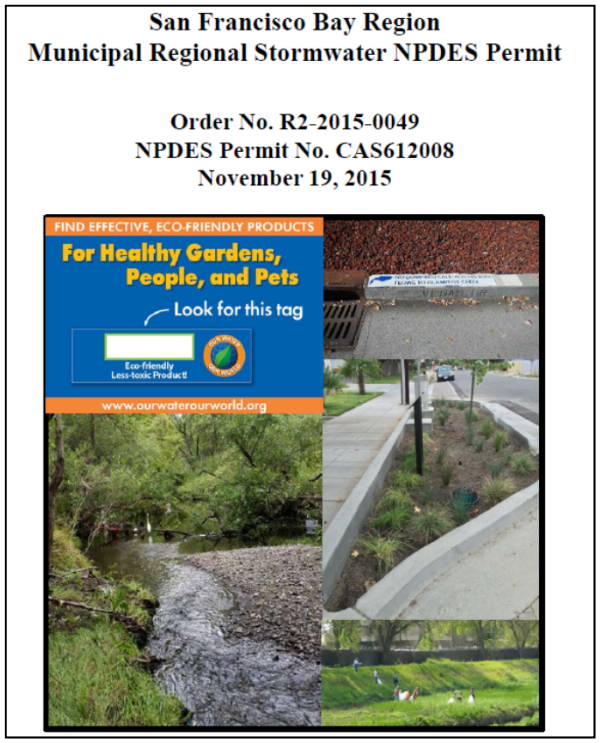
Municipal Regional Permit (MRP)

- **First adopted by Regional Water Board: October 14, 2009**
- **Permit renewed every 5 years**
- **Reissued November 19, 2015**
- **Became effective January 1, 2016**



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Construction Site Control Program

- **MRP Provision C.6**
- **Implement a construction site inspection and control program**
  - **at all construction sites**
  - **all year long**
- **Prevent discharges of pollutants and impacts on receiving waters**

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Construction Site Control Program Requirements

- **Legal authority**
- **Plan Approval Process**
- **Require appropriate BMPs within 6 categories**
  - Erosion Control
  - Sediment Control
  - Good Site Management
  - Non-stormwater Management
  - Run-on and Run-off Control
  - Active Treatment Systems

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Minimum Inspection Requirements

- **Pre-wet season letter by September 1st**
- **Monthly inspections during wet season**
  - October 1st – April 30th
- **Applies to following sites (public & private)**
  - disturbing > 1 acre,
  - identified as “high priority”
  - hillside projects disturbing > 5,000 sq ft (began inspections this wet season)

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Minimum Inspection Requirements

- **What is a hillside site?**
  - Based on municipality hillside development maps or criteria

  OR

  - ≥ 15% slope
- **Certified criteria in 2016 Annual Report**
  - 14 agencies used default criteria
  - 6 agencies submitted map, ordinance or criteria of 15% - 35% (Hillsborough, Pacifica, Redwood City, San Carlos, SSF, Woodside, County)

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FY 15/16 Reported Sites

Agency	# High Priority Sites	# Sites ≥ 1 acre	# Enforcement Actions
Atherton	0	7	3
Belmont	16	1	14
Brisbane	0	4	0
Burlingame	2	1	0
Colma	0	0	0
Daly City	0	5	2
East Palo Alto	0	2	2
Foster City	0	8	5
Half Moon Bay	0	4	4
Hillsborough	9	5	72
Menlo Park	15	10	0
Millbrae	0	0	0
Pacifica	0	2	18
Portola Valley	0	0	0
Redwood City	2	13	0
San Carlos	2	4	0
San Mateo	0	11	0
San Mateo County	48	8	60
South San Francisco	2	6	49
Woodside	0	4	0

Hillside Site Inspections

- How many new sites?
- Already captured under High Priority?
- What are the differences?

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How big is 5,000 sf?

How big is 5,000 sf?

How big is 5,000 sf?

Hillside Site Inspections

- **Higher level of SW BMP education**
  - BMP Plan Sheet
  - Brochures
- **Higher erosion potential**
  - Slope interruption
    - Fiber rolls: trenched in, staked, along contours, turned uphill at ends
    - Compost rolls: same but do not need to be trenched in

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CASQA BMP Handbook

- **Locate fiber rolls on level contours spaced as follows**

< 25% (4:1) Slope	Fiber rolls should be placed at a maximum interval of **20 ft.**
25 - 50% Slope	Fiber rolls should be placed at a maximum interval of **15 ft.**
> 50% (2:1) Slope	Fiber rolls should be placed at a maximum interval of **10 ft.**

- **Closer spacing is more effective**

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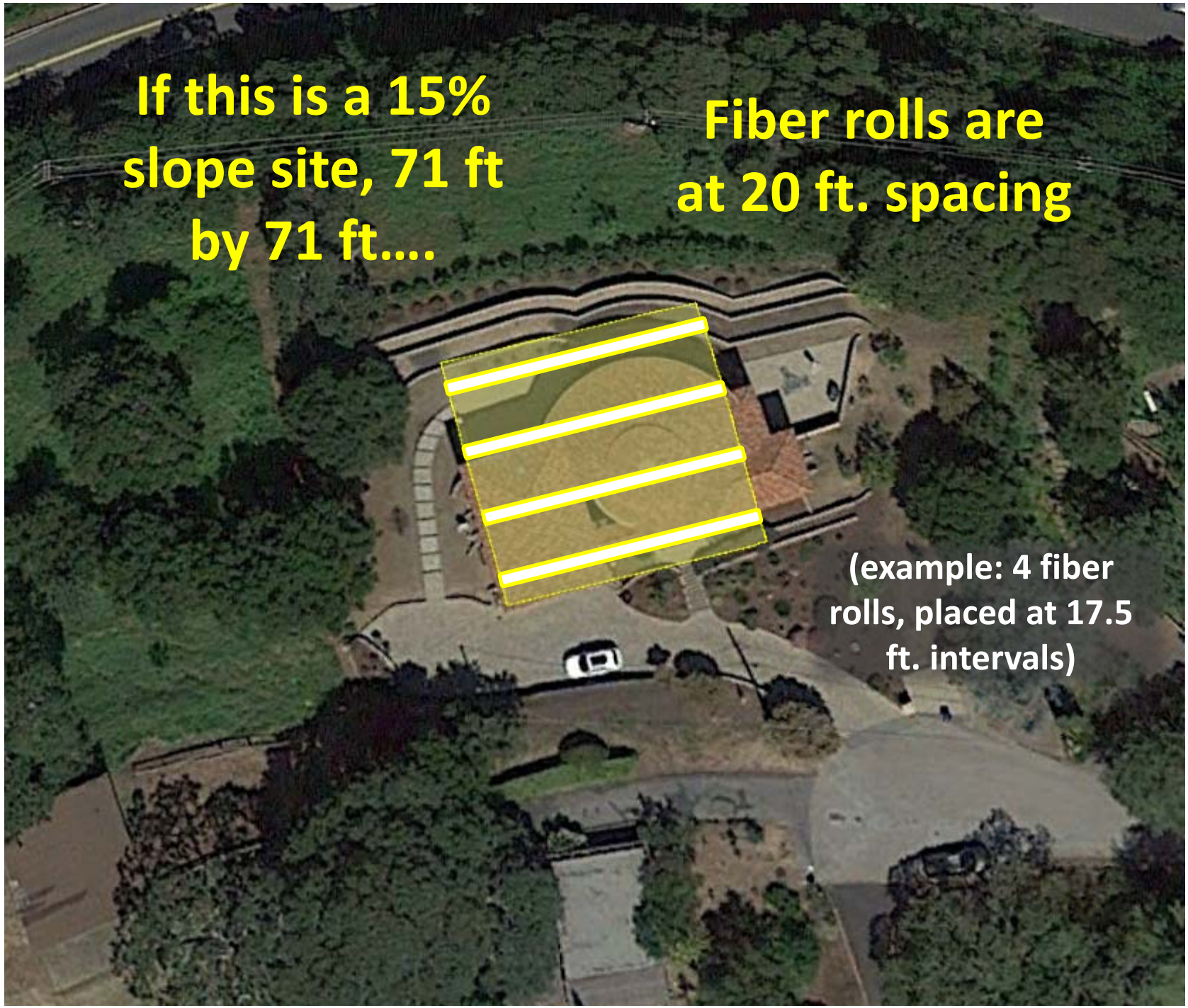
If this is a 15% slope site, 71 ft by 71 ft….


If this is a 15% slope site, 71 ft by 71 ft….
Fiber rolls are at 20 ft. spacing
(example: 4 fiber rolls, placed at 17.5 ft. intervals)

Hillside Site Inspections

- **Off-site inlet protection**
  - How far downstream/downhill?
  - Check dams can also be used
  - REMOVE after project
- **Perimeter controls**
  - Sheet flow or more concentrated discharge locations?
  - Silt fence should not be used for concentrated flows
- **Housekeeping**
  - Flat areas (e.g., portable toilet placement)

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Minimum Inspection Requirements

- **Complete inspection form for every required inspection**
  - Inspection forms contain required data tracking information
  - SMCWPPP updated template July 1, 2016
- **When construction ends during wet season:**
  - Continue inspections until site fully stabilized
  - If stabilizing with vegetation, assume “fully stabilized” when 70% vegetative cover
- **Document “Last” inspection**

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Inspection Recordkeeping

- **Tracking and reporting of data:**
  - Site name and inspection date
  - Weather during inspection
  - Enforcement response level
  - Problems in 6 BMP categories or illicit discharge
  - Resolution of problems
  - Comments

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FY 15/16 Problems Reported

BMP Category	# Reported
Sediment Control	153
Good Site Management	55
Erosion Control	50
Run-off/Run-on Control	14
Non-stormwater Management	10

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Inspection Recordkeeping

- **Database/spreadsheet of inspections**
  - SMCWPPP updated Excel tracking table
- **RWB has requested these tables**
- **Inspection tables should match Annual Report summaries**
- **2016-2017 Annual Report and forward**
  - Begin reporting hillside site inspections (NEW)
  - Small reduction in reporting requirements

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Enforcement Response Plan

- **Guidance for inspectors to take consistent actions to bring sites into compliance**
  - Identify enforcement tools
  - Roles and responsibilities of staff
  - Time period for implementing corrective actions
  - Referrals to another agency
  - Escalating enforcement

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Enforcement Response Plan

- **Issue Enforcement Action**
  - Actual non-stormwater discharge
  - Potential non-stormwater discharge (ineffective/lack of BMPs)
- **Escalating enforcement**
  - Non-compliance with previous enforcement actions – escalate to next level
  - Sites with history of chronic problems – start at higher level

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Enforcement Response Plan

- **Timely Correction**
  - Actual non-stormwater discharges cease immediately (NEW)
    - Construction General Permit authorized non-stormwater discharges conditionally allowed
  - Corrective actions implemented
    - Within 10 business days,
    - Or before next rain event,
    - OR record rationale for longer compliance.
  - Verify corrective actions taken

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Source Control: Copper (Provision C.13.a)

- **Runoff from architectural copper can impact water quality and aquatic life**
  - Concerns during installation, treatment and washing

- **When issuing building permits require BMPs**
- **Annually report permitting and enforcement**

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Requirements for Architectural Copper

Protect water quality during installation, cleaning, treating, and washing!

Copper from Buildings May Harm Aquatic Life

Copper can harm aquatic life in San Francisco Bay. Water that comes into contact with architectural copper may contribute to impacts, especially during installation, cleaning, treating, or washing. Patination solutions that are used to obtain the desired shade of green or brown typically contain acids. After treatment, when the copper is rinsed to remove these acids, the rinse water is a source of pollutants. Municipalities prohibit discharges to the storm drain of water used in the installation, cleaning, treating and washing of architectural copper.

Building with copper flashing, gutter and drainpipe.

Use Best Management Practices (BMPs)

The following Best Management Practices (BMPs) must be implemented to prevent prohibited discharges to storm drains.

During Installation

- If possible, purchase copper materials that have been pre-patinated at the factory.
- If patination is done on-site, implement one or more of the following BMPs:
  - Discharge the rinse water to landscaping. Ensure that the rinse water does not flow to the street or storm drain. Block off storm drain inlet if needed.
  - Collect rinse water in a tank and pump to the sanitary sewer. Contact your local sanitary sewer agency before discharging to the sanitary sewer.
  - Collect the rinse water in a tank and haul off-site for proper disposal.
- Consider coating the copper materials with an impervious coating that prevents further corrosion and runoff. This will also maintain the desired color for a longer time, requiring less maintenance.

Storm drain inlet is blocked to prevent prohibited discharge. The water must be pumped and disposed of properly.

During Maintenance

Implement the following BMPs during routine maintenance activities, such as power washing the roof, re-patination or re-application of impervious coating:

- Block storm drain inlets as needed to prevent runoff from entering storm drains.
- Discharge the wash water to landscaping or to the sanitary sewer (with permission from the local sanitary sewer agency). If this is not an option, haul the wash water off-site for proper disposal.

Protect the Bay/Ocean and yourself!

If you are responsible for a discharge to the storm drain of non-stormwater generated by installing, cleaning, treating or washing copper architectural features, you are in violation of the municipal stormwater ordinance and may be subject to a fine.

Photo credit: Don Edwards National Wildlife Sanctuary

Contact Information

The San Mateo Countywide Water Pollution Prevention Program lists municipal stormwater contacts at www.flowstobay.org (click on "Business", then "New Development", then "local permitting agency").

FINAL February 29, 2012

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For More Information…

- **Municipal Regional Stormwater Permit**
  http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/Municipal/R2-2015-0049.pdf

- **SMCWPPP Construction BMP Resources**
  http://www.flowstobay.org/brochures

- **SMCWPPP Training Resources**
  http://www.flowstobay.org/trainings

- **CASQA Construction BMP Handbook Portal (contact your agency SW coordinator for information on how to access web subscription)**
  www.casqa.org

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